

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,  
LI MINJUN,  
TU LAN,  
ZHU FENG,

also known as “Johnny Zhu,”

KUANG ZEBIN,

also known as “Vincent Kuang,”

MICHAEL MCMAHON,  
ZHAI YONGQIANG,  
ZHENG CONGYING and  
ZHU YONG,

also known as “Jason Zhu,

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**CERTIFICATION OF FILING  
AND SERVICE**

*Filed Electronically*

I, LAWRENCE S. LUSTBERG, of full age, hereby certify as follows:

1. I am an attorney at law admitted to practice before this Court and am a member of the firm Gibbons P.C., attorneys for Defendant Michael McMahon in the above-captioned matter.
2. On December 10, 2021, I caused Defendant’s Notice of Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment and to Challenge Venue as to Counts II and IV of the Superseding Indictment, Brief in Support of Defendant Michael McMahon’s Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment and to Challenge Venue as to Counts II and IV of the Superseding Indictment, a Proposed Order, and this Certificate of Service to be filed electronically with the Court and served upon all counsel of record.

I certify that all of the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are knowingly or intentionally false, I am subject to punishment.

Dated: December 10, 2021

Respectfully submitted,

s/Lawrence S. Lustberg  
Lawrence S. Lustberg  
Genna A. Conti  
**GIBBONS P.C.**  
One Gateway Center  
Newark, New Jersey 07102  
Tel: (973) 596-4500  
Fax: (973) 596-0545  
[llustberg@gibbonslaw.com](mailto:llustberg@gibbonslaw.com)

Brian J. Neary  
**Law Offices of Brian J. Neary**  
21 Main Street  
Court Plaza South, Suite 305  
Hackensack, New Jersey 07601  
(973) 596-4500

*Attorneys for Defendant Michael McMahon*